

Message

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Sent: 10/28/2021 3:24:35 PM
To: Hansel, Joel [Hansel.Joel@epa.gov]; Cooper, Jamal [cooper.jamal@epa.gov]
Subject: GA Narrative

Jamal, Joel,

I just spoke with Hutton Brown. He was aware that GA EPD had proposed the revision to strike out the word unreasonably and had the link that Jamal had provided during our call this morning. He asked the status of EPA's review. I let him know that the original action was still in front of us and that we had not acted, but we had been in discussions with the state as evidenced by the two public letters (EPA's Oct. 5, 2018 and EPD's Dec 11, 2020.) In discussions, he understood that, in effect, the remedy (removal of the word) was being accomplished doing this triennial. I confirmed that the word is not in effect for any CWA purposes. I told him that we would provide him a copy of our final action when we took it.

I let him know that Jamal would be the best person to check in with on the status of the GA Triennial and he asked for Jamal's information. So, I will send an email to both connecting.

He also expressed concern that EPD will apply the unreasonably provision to the Rayonier permit when it comes up for renewal. EPD's letter indicates that may be the case, as well. I recommend that we talk to permitting and talk through that in order to ensure that the WQS are being properly applied. **Thoughts?**

Lisa

Lisa Perras Gordon

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